



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

May 26, 2021

**BY ECF AND EMAIL**

**MEMO ENDORSED**

The Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. James Thomas, et al, S1 21 Cr. 249 (SHS)**

Dear Judge Stein:

The Government submits this letter in advance of the June 3, 2021 conference in the above-captioned matter. With the consent of defense counsel, the Government respectfully requests that time be excluded under the Speedy Trial Act from May 26, 2021, until June 3, 2021. The Government respectfully submits that the proposed exclusion would be in the interest of justice as it would allow the parties to continue to produce and review discovery as well as to engage in pretrial negotiations. Defense counsel has no objection to the exclusion of time.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

by: Ashley C. Nicolas  
Ashley C. Nicolas  
Assistant United States Attorney

cc: Robert Soloway, Esq. (counsel for James Thomas)  
Lance Lazzaro, Esq. (counsel for Courtney Schloss)  
D. Andrew Marshall, Esq. (co-counsel for Duvaughn Wilson)  
Marlon Kirton, Esq. (co-counsel for Duvaughn Wilson)

**The time is excluded from calculation under the Speedy Trial Act from today until June 3, 2021. The Court finds that the ends of justice served by this continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to 18 U.S.C. Sec. 3161(h)(7)(A).**

**Dated: New York, New York  
May 26, 2021**

**SO ORDERED:**

Sidney H. Stein  
Sidney H. Stein, U.S.D.J.